

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

SIMON GOGOLACK,

Defendant.

23-CR-99-JLS-JJM

NOTICE OF MOTION

MOTION BY:

Jeffrey T. Bagley, Assistant Federal Public
Defender

DATE, TIME & PLACE:

Before the Honorable Jeremiah J. McCarthy, United
States Magistrate Judge, Robert H. Jackson United
States Courthouse, 2 Niagara Square, Buffalo, New
York, **on the papers submitted.**

SUPPORTING PAPERS:

Affirmation of Assistant Federal Public Defender
Jeffrey T. Bagley, dated September 27, 2024

RELIEF REQUESTED:

Adjournment of Deadline to File Defendant
Proposed Protected Order

DATED:

Buffalo, New York, September 27, 2024

/s/ Jeffrey T. Bagley

Jeffrey T. Bagley
Assistant Federal Public Defender
Federal Public Defender's Office
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Counsel for Defendant

TO: Caitlin M. Higgins, *et al.*
Assistant United States Attorneys
Western District of New York
138 Delaware Avenue, Federal Centre
Buffalo, New York 14202

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AFFIRMATION

SIMON GOGOLACK,

Defendant.

JEFFREY T. BAGLEY, affirms under penalty of perjury that:

1. I am an Assistant Federal Public Defender for the Western District of New York and was assigned to represent the above-named defendant, Simon Gogolack.

2. The court set a new deadline of September 27, 2024, to submit a proposed protective order.

3. Additional time is needed for counsel to consult with the other defense counsel. A proposed order is nearly finalized but additional time is needed to ensure that all defense counsel agree.

4. Accordingly, this motion respectfully requests an adjournment of the proposed protected order deadline until Monday, September 30, 2024.

DATED: Buffalo, New York, September 27, 2024

Respectfully submitted,

/s/ Jeffrey T. Bagley

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